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**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

In re Effexor XR Antitrust Litigation

This Document Relates to:

Direct Purchaser Actions

Master Docket No.

3:11-cv-05479 (PGS/JBD)

**DIRECT PURCHASER CLASS PLAINTIFFS' UNOPPOSED
MOTION FOR CERTIFICATION OF A SETTLEMENT CLASS,
APPOINTMENT OF LEAD CLASS COUNSEL, PRELIMINARY
APPROVAL OF PROPOSED SETTLEMENT, APPROVAL OF THE
FORM AND MANNER OF NOTICE TO THE CLASS AND
PROPOSED SCHEDULE FOR A FAIRNESS HEARING**

Direct Purchaser Class Plaintiffs hereby move, unopposed, for certification for purposes of settlement of a class of direct purchasers, appointment of Lead Class Counsel, preliminary approval of their proposed Settlement Agreement with Wyeth LLC, Wyeth Pharmaceuticals, Inc., Wyeth-Whitehall Pharmaceuticals LLC, and

Wyeth Pharmaceuticals Company (collectively or individually, “Wyeth”), approval of the form and manner of notice to the settlement class, preliminary approval of the proposed Plan of Allocation, appointment of the Notice and Claims Administrator, appointment of the Escrow Agent, and a proposed schedule for a Fairness Hearing.

Direct Purchaser Class Plaintiffs submit a Proposed Order herewith.

Dated: April 9, 2024

Respectfully submitted,

/s/ Peter S. Pearlman

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Interim Executive Committee for the Direct Purchaser Class Plaintiffs